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11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DANIEL LUCERO,

15 Plaintiff,

v.

16 ISABEL GUZMAN, ADMINISTRATOR
17 and SMALL BUSINESS
18 ADMINISTRATION,

19 Defendants.

20 Case No. 2:21-cv-00915-RFB-VCF

21
22 **Stipulation and Order to**
Extend Certain Discovery Deadlines
(Third Request)

23 Pursuant to LR IA 6-1 and LR 26-3, the parties request a 30-day extension of certain
24 discovery deadlines as, and for the reasons, set forth below. This stipulation is filed at least
25 21 days before the earliest deadline to be extended (close of discovery). This is the third
request for an extension of the discovery schedule.

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27 **DISCOVERY COMPLETED**

28 The parties have completed the following disclosures and discovery:

29 The parties served their respective initial disclosures, and Plaintiff supplemented
30 their disclosures.

31 Defendant served initial discovery requests, and Plaintiff responded to them.

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33 **DISCOVERY REMAINING**

34 Plaintiff and Defendant intend to depose the Parties and their representatives as well
35 as the numerous witnesses to the allegations in this case, as well as any other witnesses.

1 Defendant scheduled the deposition of Plaintiff Daniel Lucero on May 25, 2023. Plaintiff
2 scheduled the deposition of former SBA employee Denise Biaggi-Ayer on June 22, 2023.

3 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

4 The deposition of former SBA employee Denise Biaggi-Ayer was initially scheduled
5 on June 1, 2023, but due to scheduling conflicts Plaintiff rescheduled her deposition to June
6 22, 2023, which is after the close of discovery. This extension is needed to complete the
7 discovery in this case.

8 Additionally, the discovery cutoff and the dispositive motions deadlines were
9 calculated incorrectly in the previously submitted Stipulation to Extend. The dispositive
10 motions deadline is currently before the discovery cutoff deadline.

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EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed extended deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cutoff	06/19/2023	07/19/2023
Dispositive Motions	06/08/2023	08/21/2023
Proposed Joint Pretrial Order	08/21/2023	09/20/2023 ¹

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 18th day of May 2023.

BLACK & WADHAMS

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 6-2-2023

¹ If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.